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1 teacher and they teach them.

2 Q. So you would take your class to the
3 chapel?

4 A. Not to the chapel, but they had a
5 little room set up.

6 Q. So on Wednesdays you would take your
7 class to a room to receive religious
8 education?

9 A. Yes, sir.

10 Q. And what kind of education would they
11 receive on chapel day?

12 A. That was up to the chapel teacher.

13 Q. Who would the chapel teachers be?

14 A. Miss Honey was one.

15 Q. Miss Honey?

16 A. Yes, Honey Williams.

17 Q. Honey Williams. Who else? Who else
18 would do the chapel-teaching program?

19 A. That was it for the threes.

20 Q. So Honey would do every chapel day for
21 the three-year-olds?

22 A. Yes, sir.

23 Q. And what would she teach during chapel

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1 day?

2 A. That was her curriculum.

3 Q. Okay. So you brought the children in.

4 Were you there with them, stayed with

5 them, during this time?

6 A. Yes, sir.

7 Q. And what would the message be -- what

8 was the point of going to chapel day?

9 A. It was chapel day.

10 Q. Right. I understand it's chapel day.

11 What was the point in taking the kids

12 to chapel day?

13 A. I'm trying to understand what you're

14 saying. What do you mean? What's

15 the --

16 Q. I mean, I wasn't there. You were there

17 every Wednesday.

18 A. Right.

19 Q. You would take these kids to this room

20 that was set up for what you're telling

21 me was chapel day.

22 A. Right.

23 Q. There'd be a speaker in there who

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1 taught about religious topics; correct?

2 A. Correct.

3 Q. Now, I'm just asking you what she would
4 teach. I wasn't there. I don't know.

5 I need to know what she would teach.

6 A. She would teach religious topics.

7 Q. Religious topics?

8 A. Uh-huh.

9 Q. Is there any rhyme or reason which
10 topics she would discuss?

11 A. It would be different.

12 Q. So it was a different religious topic
13 every time, every Wednesday?

14 A. Yes.

15 Q. And corresponding with that chapel day,
16 there would also be a pamphlet that
17 would be passed out to you and your
18 children?

19 A. No, to the children.

20 Q. Who passed those pamphlets out?

21 A. The teachers put them in the cubbies.

22 Q. Did you do that?

23 A. Yes, sir.

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1 your three-year-olds, would she provide
2 a lesson or a Bible verse to be taught
3 to your children after?

4 A. Explain. Would she --

5 Q. Yeah. When she went to chapel day --
6 I'm sorry. When you took your children
7 to chapel day on Wednesday, did she
8 provide a Bible verse or any kind of
9 lesson to teach the kids thereafter?

10 A. No, sir.

11 Q. Okay. Now, after you left the three-
12 year-olds -- how long were you with the
13 three-year-old kids?

14 A. Two years.

15 Q. And where did -- job changed after
16 that?

17 A. Yes.

18 Q. What did it change to?

19 A. To pre-K teacher.

20 Q. The pre-K teacher. Did you receive a
21 wage increase at that time?

22 A. Yes, sir.

23 Q. What was it?

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1 Q. Okay. Is there -- after group time,
2 what would you do?

3 A. We will clean up and get ready to go
4 outside.

5 Q. Clean up and get ready for outside?

6 A. Yes.

7 Q. When would you go outside?

8 A. Eleven.

9 Q. Eleven o'clock?

10 A. Uh-huh.

11 Q. Did you go to the playground?

12 A. Yes, sir.

13 Q. How long did you stay out there?

14 A. Thirty minutes.

15 Q. And after their thirty minutes was up
16 outside, what would you do?

17 A. Come in and have lunch.

18 Q. Okay. Now, would you lead them in a
19 prayer prior to lunch?

20 A. Yes, sir.

21 Q. I'm sorry?

22 A. Yes, sir.

23 Q. What kind of prayer would you do?

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1 A. Specify what you mean.

2 Q. What prayer?

3 A. The blessing of the food.

4 Q. Okay. Was it a standard prayer you did
5 every single day or did you change it
6 up some?

7 A. Standard every single day.

8 Q. Who taught you that prayer?

9 A. The one I use at home.

10 Q. Okay. So you would bring your prayer
11 that you use at home and it would be
12 the same for the children at ECDC --

13 A. Yes, sir.

14 Q. -- prior to them eating?

15 A. Yes, sir.

16 Q. After lunch, what would the kids do?

17 A. Go to nap.

18 Q. Go to nap?

19 A. Yes.

20 Q. Where would they nap?

21 A. What do you mean where would they nap?

22 Q. Where would they nap? Where would they
23 sleep?

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1 A. No, sir.

2 Q. Did you ever prompt them to pray before
3 the snack?

4 A. Which meal?

5 Q. Snack.

6 A. The first or the second?

7 Q. There's two afternoon snacks?

8 A. Yes. Well, there was one in the
9 morning and one in the afternoon.

10 Q. All right. Tell me about the morning
11 first. Did you prompt them in the
12 morning snack --

13 A. Yes.

14 Q. -- to pray?

15 A. Yes, sir.

16 Q. And how about the afternoon?

17 A. No, sir.

18 Q. So the morning snack you would prompt
19 them to pray?

20 A. Yes.

21 Q. And you prompted them to pray before
22 lunch; correct?

23 A. No, sir.

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1 Q. Well, you just testified a minute ago
2 that you prayed before every lunch with
3 the prayer you brought from home;
4 right?

5 A. Right.

6 Q. So you'd pray before the morning snack?

7 A. Right.

8 Q. And you'd pray before --

9 A. Lunch.

10 Q. -- lead them in prayer before lunch?

11 A. Right.

12 Q. But you would not during the afternoon
13 snack?

14 A. They did it without me.

15 Q. So they prayed without you in the
16 afternoon?

17 A. (Witness nods head.)

18 Q. How did they know to do that?

19 A. It was a repetition thing that we did.

20 Q. Okay. So at that point they're just
21 used to it and they'd pick it up and do
22 it themselves?

23 A. Yes.

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1 Q. Which prayer would they pray in the
2 afternoon snack?

3 A. The same one.

4 Q. This the one you brought from home and
5 taught them?

6 A. Yes.

7 Q. Now, after afternoon snack, what would
8 you all do?

9 A. Read a story and get ready to go
10 outside.

11 Q. Tell me about that story. What kind of
12 stories would you read?

13 A. Stories that's on the topic of the day.
14 Like if it's firefighters, we'll try to
15 read a firefighter story and safety and
16 transportation.

17 Q. Okay. Are these biblical-based
18 stories?

19 A. No, sir.

20 Q. So you never read the children any
21 biblical-based story in the afternoon
22 time when you were there?

23 A. Yes, sir.

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1 Q. You did?

2 A. Yes, sir.

3 Q. Okay. Explain to me when you would
4 read them the biblical-based stories in
5 the afternoon.

6 A. When it was on the lesson plan to do.

7 Q. That's your lesson plan; right?

8 (No immediate response given.)

9 Q. Right?

10 A. For the topic of the week, yes.

11 Q. So you would have the freedom in your
12 lesson plan to pick a religious story
13 to teach the topic of the week;
14 correct?

15 A. Yes, sir.

16 Q. And you would choose that religious
17 story?

18 A. Yes, sir.

19 Q. Now, in the -- after you read their
20 afternoon story, what would you do
21 then?

22 A. We'd go back outside.

23 Q. So your second outside break?

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1 A. Outside break.

2 Q. Was it thirty minutes as well?

3 A. Yes, sir.

4 Q. Okay. And after you came back in from
5 your second outside break, what would
6 you do?

7 A. Go home.

8 Q. Did the children ever have a prayer
9 before they left for the day?

10 A. I was gone before they was.

11 Q. You were gone before your children
12 were?

13 A. Yes. I left at 3:30.

14 Q. Okay. So before you left in the
15 afternoon time was there an afternoon
16 prayer?

17 A. No, sir.

18 Q. Now, when you needed religious
19 literature to teach your lesson plan,
20 where would you get that?

21 A. From my church or my home.

22 Q. Okay. So when you needed religious
23 material to teach from, you would get

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1 that from your personal church or your
2 home?

3 A. Yes, sir.

4 Q. And you would bring that in for them to
5 learn from?

6 A. Yes, sir.

7 Q. Okay. Were you -- did you ever go to
8 any libraries, anything of that nature,
9 to pick up religious literature?

10 A. No, sir.

11 Q. Is that a no?

12 A. Yes, sir.

13 Q. In the pre-K class, were there coloring
14 books?

15 A. Specify "coloring books."

16 Q. Were there any coloring books in the --

17 A. Yes, coloring books.

18 Q. There were?

19 A. Yes.

20 Q. Were the coloring books religious in
21 nature?

22 A. No, sir.

23 Q. Were any of them ever religious in

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1 nature, the coloring books?

2 A. The ones they receive on Wednesdays.

3 Q. So every Wednesday they would receive
4 coloring books during chapel day; is
5 that correct?

6 A. Yes, sir.

7 Q. And those coloring books would always
8 be religious in nature?

9 A. Yes, sir.

10 Q. And that's every Wednesday; correct?

11 A. Correct.

12 Q. Was there ever a time where you would
13 write a biblical verse on a blackboard
14 and have the children memorize it?

15 A. No, sir.

16 Q. Was there ever any directive that the
17 children had to learn the books of the
18 Bible, for instance?

19 A. No, sir.

20 Q. Was there any -- were you ever -- as a
21 teacher at ECDC, were you responsible
22 for teaching the children any specific
23 religious teaching?

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1 A. No, sir.

2 Q. They didn't have the learn the saints,
3 the apostles, the --

4 A. No.

5 Q. -- books of the Bible, nothing like
6 that?

7 A. No, sir.

8 Q. In the pre-K room, were there religious
9 pictures on the walls?

10 A. No, sir.

11 Q. Was there a Bible in the room?

12 A. Yes, sir.

13 Q. There was?

14 A. Yes, sir.

15 Q. Was it Bibles for the children to read?

16 A. Yes, sir.

17 Q. Was that a yes?

18 A. Yes, sir.

19 Q. When would they read those Bibles?

20 A. When they go into the library.

21 Q. When they go in the library?

22 A. Yes.

23 Q. When would they go in the library?

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1 A. It was at their discretion.

2 Q. Sorry?

3 A. It was at their discretion when they go
4 into the library.

5 Q. The four-year-old children had
6 discretion to go in the library?

7 A. Yes, sir.

8 Q. And there were Bibles there for them to
9 learn -- I mean to read.

10 A. It was a center. It was a center
11 there.

12 Q. It was a center?

13 A. Yes, sir.

14 Q. Okay. So there was a religious center?

15 A. Uh-uh. That was the library.

16 Q. Okay. So the library has the religious
17 material?

18 A. It had a picture book.

19 Q. It had a picture book --

20 A. Yes.

21 Q. -- in the library?

22 A. Yes.

23 Q. Did they go there every day?

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1 A. No, sir.

2 Q. When would they go to library?

3 A. It varied.

4 Q. It varied?

5 A. (Witness nods head.) Uh-huh.

6 Q. Would you send them in there?

7 A. No, sir.

8 Q. You never sent a child to library?

9 A. No, sir.

10 Q. Why would it vary?

11 A. Because it was part of the centers.

12 Q. It was part of the centers?

13 A. Right. The centers in the classroom.

14 Q. So they had access to this every day?

15 A. Yes, sir, it was there every day.

16 Q. And they would just decide whether or
17 not they wanted to go?

18 A. Yes, sir.

19 Q. But that wasn't part of your lesson
20 plan one way or the other?

21 A. No, sir.

22 Q. How long did you stay with the pre-K
23 class?

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1 A. Until my termination.

2 Q. When was that?

3 A. '04, '05.

4 Q. You think you were terminated in 2004
5 or 2005?

6 A. A year ago.

7 Q. 2005?

8 A. Yes.

9 Q. Okay. Now, when you went to work at
10 ECDC, did you understand that it was a
11 religious institution?

12 A. Did I -- what you mean?

13 Q. Did you understand you were going to
14 teach at a religious school, religious
15 institution?

16 A. Don't remember, no, sir.

17 Q. You don't remember what?

18 A. If it was a religious-teaching school?
19 What you mean?

20 Q. I'm sorry?

21 A. What are you trying to . . .

22 Q. Well, I just want to know, when you
23 started work at ECDC -- I mean, you'd

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1 already been there training for an
2 amount of time, then you went back and
3 applied for a job there. I just want
4 to get your testimony whether or not
5 you understood that ECDC was a
6 religious institution, part of a
7 church?

8 A. Oh, yes, sir, it was part of a church.

9 Q. So you understood that the ECDC program
10 was part of First United Methodist
11 Church?

12 A. Yes, sir.

13 Q. And you understood -- I mean, it's
14 attached to the church?

15 A. Yes.

16 Q. Okay. And when you got -- when you
17 applied for that job, did you expect
18 that a lot of what you'd be doing would
19 involve religious teaching?

20 A. No, sir.

21 Q. You didn't understand that?

22 A. No. It wasn't a -- it wasn't told that
23 I had to do that, no, sir.

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1 Q. I need to know what we've done wrong.

2 I need to know what you're claiming how
3 we've discriminated against you. I
4 need to know all the instances you're
5 talking about.

6 A. Okay.

7 Q. So let me have it.

8 A. My leave time.

9 Q. Relieve time?

10 A. Yes, leave time.

11 Q. Leave time. What about leave time?

12 A. What do you mean?

13 Q. Well, I mean, it's your lawsuit. All
14 right? You've got to tell me what
15 we've done wrong. That's what I need
16 to know. So, you're saying leave time.
17 Okay. What about leave time have we
18 done wrong? What do you mean?

19 A. Allowing the gender and race to be able
20 to leave and personal time.

21 Q. All right. I don't understand that.
22 You're going to have to help me.

23 MR. HURST: I think he's asking

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1 for specifics.

2 MR. GARRETT: I am.

3 Absolutely. I need --

4 MR. HURST: He's asking, like,
5 when did you see this? When was the
6 male or when was --

7 Q. Right. What are you talking about?
8 That's what I need to know. What leave
9 time? What are you talking about?

10 A. With the male, when he was asked for
11 time, he received that time without any
12 scrimacy (phonetic) about it. They
13 allowed him to go when he wanted to go.

14 Q. Okay. Hold on. You said "the male."

15 A. The male.

16 Q. What male? Who are you talking about?

17 A. Mr. Bronson.

18 Q. Who?

19 A. Mr. Bronson.

20 Q. Mr. Bronson?

21 A. Yeah.

22 Q. Who is --

23 A. Lamar Bronson.

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1 Q. Mr. Lamar Bronson?

2 A. Yes.

3 Q. And who is Mr. Lamar Bronson?

4 A. He was an employee there.

5 Q. He was an employee. What kind of
6 employee was Mr. Bronson?

7 A. A floater.

8 Q. He was a floater?

9 A. Yes, sir.

10 Q. And when was he floating?

11 A. From eleven to closing.

12 Q. I mean, what time period are we talking
13 about here? What year? When are you
14 talking about?

15 A. Oh, in '04-'05.

16 Q. '04-'05?

17 A. Uh-huh.

18 Q. So Mr. Bronson was floating at some
19 point between 2004 and 2005?

20 A. Yes, sir.

21 Q. We've got that. And you're saying that
22 he got leave time?

23 A. Yes, sir.

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1 Q. How do you know that?

2 A. Because he would fill out his forms.

3 Q. And how would you see his forms?

4 A. He would bring them in the room and
5 fill them out.

6 Q. So he -- it's your perception that he
7 requested time off and was given time
8 off?

9 A. Yes, sir.

10 Q. And that you requested time off but
11 weren't given time off sometime in 2004
12 and 2005?

13 A. Yes, sir.

14 Q. That's the claim?

15 A. No, sir. I mean, that's part of it.

16 Q. Okay. Now, what time off was he
17 requesting?

18 A. It varied. When he requested his time
19 off, how . . .

20 Q. How do you know -- I'm confused. How
21 do you -- what are you talking about?
22 What time off would he request, first
23 of all? That's the first question.

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1 What would he ask off for?

2 A. To go off to be with his family or to
3 go to school and go to work.

4 Q. He was already -- go to another job?

5 A. Yes, sir.

6 Q. So it's your perception that he would
7 make request for time off during 2004
8 and 2005 to go to work, to go --

9 A. To school.

10 Q. -- to see his family --

11 A. And to go to school.

12 Q. -- and to go to school. Sometime in
13 that year period he would make those
14 requests?

15 A. Yes, sir.

16 Q. How do you know that?

17 A. He would fill his form out.

18 Q. He would fill his form out?

19 A. Yes.

20 Q. How do you know he was filling his form
21 out?

22 A. He would bring them in the classroom
23 and he would ask me did I have any --

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1 because we couldn't take off if it was
2 one person out of the classroom. One
3 teacher had to be there at all time.

4 Q. Well, yeah. I know. But he would --
5 so you would watch him fill out --

6 A. Yes.

7 Q. -- request forms for time off?

8 A. Yes.

9 Q. And he would submit them in to where?

10 A. Ms. Darlene Maye.

11 Q. And it's your perception that he was
12 granted time off?

13 A. Yes, sir.

14 Q. Now, do you know anything about how
15 many days he had accrued for vacation?

16 A. No, sir. He was part-time.

17 Q. So he was part-time?

18 A. Uh-huh.

19 Q. You don't know -- how do you know about
20 his schedule? How would you know how
21 many days he had off or didn't?

22 A. Because he was in his ninety-day
23 probation and you don't receive any

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1 time off until after your ninety-day
2 probation.

3 Q. Okay. So he was -- sometime in 2004
4 and 2005 he was on a ninety-day
5 probation?

6 A. Yes, sir.

7 Q. While he was floating?

8 A. Yes, sir, as a probation period.

9 Q. Ninety days of probation?

10 A. Yes, sir.

11 Q. And during that ninety-day probation,
12 you don't -- it's your belief that
13 there is no time off given; is that
14 correct?

15 A. Yes.

16 Q. Is that correct?

17 A. Yes, sir.

18 Q. No time off given during that ninety-
19 day period. All right. And you think
20 that he got time off during those
21 ninety days?

22 A. Yes, sir.

23 Q. And that would be work, family, and

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1 school --

2 A. Yes.

3 Q. -- as far as you know?

4 A. Yes.

5 Q. Any other instances that you're talking
6 about or is it just during that
7 ninety-day period?

8 A. Other incidents.

9 Q. There's other incidents outside the
10 ninety-day period?

11 A. Yes.

12 Q. Tell me about those.

13 A. She would work around his schedule for
14 him to attend school.

15 Q. Who is "she"?

16 A. Ms. Darlene Maye.

17 Q. Would work with him to allow him to go
18 to school?

19 A. Yes, sir.

20 Q. And that's a good thing, isn't it?

21 A. Yes, sir.

22 Q. All right. How many males were over
23 there at the ECDC program when you were

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1 there?

2 A. One.

3 Q. Just one, one male?

4 A. Yes, sir.

5 Q. And that's Mr. Bronson?

6 A. Yes, sir.

7 Q. And everybody else was female?

8 A. Yes, sir.

9 Q. And he was -- how long did he stay as a
10 floater? Do you know?

11 A. No, sir.

12 Q. Okay. And, now, when Mr. Bronson was
13 receiving time off during his ninety-
14 day probationary period and then time
15 off for unknown reasons down the road,
16 how were you discriminated against?

17 A. Because when I requested time off, I
18 was denied.

19 Q. Now, when would you request time off
20 and be denied, specifically now? I'm
21 not talking about just random times
22 without years. I need to know what
23 you're talking about.

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1 (No immediate response given.)

2 Q. When did you request and when were you
3 denied?

4 A. For my children's doctors'
5 appointments.

6 Q. When was that?

7 A. In February and in June.

8 Q. February and June?

9 A. Yes.

10 Q. 2004?

11 A. No, sir, not 2004.

12 Q. What year?

13 A. February of '04, but June, I can't
14 remember what year June is.

15 Q. So February of '04 you requested time
16 off for a doctor's appointment and you
17 didn't get it?

18 A. Yes, sir.

19 Q. And then June of some unknown year,
20 same thing happened?

21 A. Yes, sir.

22 Q. And this February '04 is what we
23 already talked about earlier about --

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1 A. Yes.

2 Q. -- trying to go to your WIC
3 appointment?

4 A. Yes, sir.

5 Q. Any other -- any other request besides
6 February of '04 and the unknown June
7 request that you were denied?

8 A. When my son had an accident, car
9 accident.

10 Q. When was that?

11 A. In '04 in February.

12 Q. In February of '04?

13 A. Yes.

14 Q. Your son was in an automobile accident?

15 A. Yes, sir.

16 Q. When?

17 A. In '04.

18 Q. Right. I know. But, I mean, do you
19 know what day?

20 A. (Witness shakes head.)

21 Q. Just sometime in February?

22 A. Yes, sir.

23 Q. And you requested time off for what?

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1 A. It was -- I was -- had to leave.

2 Q. So you didn't request time off?

3 A. No. I asked could I.

4 Q. You asked who?

5 A. Ms. Darlene Maye.

6 Q. Asked her if you could have time off
7 after your son was involved in an
8 automobile accident?

9 A. Yes, sir.

10 Q. And what did she say?

11 A. She told me no.

12 Q. She just said no?

13 A. Yes, sir.

14 Q. So you went to Darlene Maye and you
15 said, Ms. Maye, my son's been involved
16 in an automobile accident. Can I
17 leave? And then she answered you no.
18 Is that --

19 A. Well, I was already off.

20 MS. MAYE: I need a break.

21 MR. GARRETT: Okay.

22 (Short recess.)

23 Q. Okay. So we've got your request for